

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

**ROBERT E. DUTTKO and
MILDRED E. DUTTKO,**

Plaintiffs,

Vs.

No. 1:24-CV-02096

MADD ASSETS, LLC,

Defendant.

**MOTION FOR EXTENSION TO FILE RESPONSIVE PLEADING AND CERTIFICATE
OF CONSULTATION**

Defendant MADD Assets, LLC, by and through undersigned counsel and without waiving any and all defenses available, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, hereby moves the Court for an extension of time to file a response to the Complaint of the Plaintiffs. Defendant would state that good cause exists for an extension of the time period for a Responsive Pleading to be filed as he has not had an opportunity to review this matter with counsel, who has yet to receive the relevant documents regarding this matter. Defendant files a Memorandum in support of this motion.

WHEREFORE, PREMISES CONSIDERED, the Defendant moves this Honorable Court for an extension until April 1, 2024 to file a Responsive Pleading.

Respectfully Submitted,

/s/ Charles H. Barnett, III

Charles H. Barnett, III, BPR #008279

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true copy of the foregoing has been served on counsel by the CM/ECF system on this 13th day of March 2024.

/s/ Charles H. Barnett, III

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), the undersigned certifies that on March 12, 2024, Charles H. Barnett, III attempted to call and sent an email to Plaintiff's counsel concerning this motion but has not heard from Plaintiff's counsel at this time as he is not in the office at the present. His staff stated they would attempt to contact him.

/s/Charles H. Barnett